

1541

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

CASSANDRA HOLDSWORTH

Criminal No. 21-196

[UNDER SEAL]

(21 U.S.C. §§ 846, 841(a)(1),  
841(b)(1)(B)(i), 841(b)(1)(B)(vi), and  
841(b)(1)(C))

**FILED**

INDICTMENT

COUNT ONE

MAY 04 2021

CLERK U.S. DISTRICT COURT  
WEST. DIST. OF PENNSYLVANIA

The grand jury charges:

From on or about December 22, 2020, and continuing to on or about December 23, 2020, in the Western District of Pennsylvania, the defendant, CASSANDRA HOLDSWORTH, did knowingly, intentionally, and unlawfully conspire with persons both known and unknown to the grand jury, to possess with intent to distribute and distribute 100 grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and a detectable amount of fentanyl, a Schedule II controlled substance; and a quantity of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B)(i), 841(b)(1)(B)(vi), and 841(b)(1)(C).

In violation of Title 21, United States Code, Section 846.

COUNT TWO

The grand jury further charges:

On or about December 23, 2020, in the Western District of Pennsylvania, the defendant, CASSANDRA HOLDSWORTH, did knowingly, intentionally, and unlawfully possess with intent to distribute 100 grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and a detectable amount of fentanyl, a Schedule II controlled substance; and a quantity of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B)(i), 841(b)(1)(B)(vi) and 841(b)(1)(C).

**FORFEITURE ALLEGATIONS**

1. The allegations contained in Count One and Two of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 21, United States Code, Sections 853(a)(1), 853(a)(2) and 853(p).

2. Pursuant to Title 21, United States Code, Section 853, upon conviction of an offense in violation of Title 21, United States Code, Sections 846, 841(a)(1), 841(b)(1)(B)(i), 841(b)(1)(B)(vi) and 841(b)(1)(C), the defendant, CASSANDRA HOLDSWORTH, shall forfeit to the United States of America any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offense and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the offense.

3. If any of the property described above, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

A True Bill,



Foreperson

STEPHEN R. KAUFMAN  
Acting United States Attorney  
PA Bar No. 42108

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Criminal No. 21-196

[UNDER SEAL]

CERTIFICATION AND NOTICE FOR FILING PRETRIAL MOTIONS

I hereby certify that I have been notified by the United States Magistrate Judge that all pretrial motions must be filed within fourteen (14) days of Arraignment unless the Court extends the time upon written application made within said fourteen (14) day period.

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Date

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Attorney for Defendant  
CASSANDRA HOLDSWORTH

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

CASSANDRA HOLDSWORTH

Criminal No. 21-196

[UNDER SEAL]

ARRAIGNMENT PLEA

Defendant CASSANDRA HOLDSWORTH

being arraigned, pleads \_\_\_\_\_

in open Court this \_\_\_\_\_ day of

, 20 \_\_\_\_\_

\_\_\_\_\_  
(Defendant's Signature)

\_\_\_\_\_  
(Attorney for Defendant)

CR-21-196

CRIMINAL CASE INFORMATION SHEETPittsburgh Erie Johnstown Related to No. \_\_\_\_\_ Judge \_\_\_\_\_  
(All criminal prosecutions arising out of the same criminal transaction or series of transactions are deemed related).

CATEGORY: 1.  Narcotics and Other Controlled Substances  
 1a.  Narcotics and Other Controlled Substances  
 (3 or more Defendants)  
 2.  Fraud and Property Offenses  
 2a.  Fraud and Property Offenses  
 (3 or more Defendants)  
 3.  Crimes of Violence  
 4.  Sex Offenses  
 5.  Firearms and Explosives  
 6.  Immigration  
 7.  All Others

Defendant's name: Cassandra HoldsworthIs indictment waived:  Yes  NoPretrial Diversion:  Yes  NoJuvenile proceeding:  Yes  NoDefendant is:  Male  FemaleSuperseding indictment or information  Yes  No

Previous case number: \_\_\_\_\_

If superseding, previous case was/will be:

Dismissed on defendant's motion  
 Dismissed on governments' motion  
 After appellate action  
 Other (explain) \_\_\_\_\_

County in which first offense cited  
occurred: AlleghenyPrevious proceedings before  
Magistrate Judge: \_\_\_\_\_

Case No.: \_\_\_\_\_

PLEASE INCORPORATE MAGISTRATE CASE WITH CRIMINAL CASE

Date arrested or date continuous U.S.  
custody began: \_\_\_\_\_

Defendant: \_\_\_\_\_ is in custody  is not in custody

Name of Institution: \_\_\_\_\_

Custody is on: \_\_\_\_\_ this charge  another charge

\_\_\_\_\_ another conviction

\_\_\_\_\_ State  Federal

Detainer filed: \_\_\_\_\_ yes  no

Date detainer filed: \_\_\_\_\_

Total defendants: 1

Total counts: 2

Data below applies to defendant No.: 1

Defendant's name: Cassandra Holdsworth

#### SUMMARY OF COUNTS

<u>COUNT</u>	<u>U.S. CODE</u>	<u>OFFENSE</u>	<u>FELONY</u>	<u>MISDEMEANOR</u>
1	21 U.S.C. § 846	Conspiracy to possess with intent to distribute and distribute 100 grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and a detectable amount of fentanyl, a Schedule II controlled substance, and a quantity of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance	<input checked="" type="checkbox"/>	
2	21 U.S.C. §§ 841(a)(1), 841(b)(1)(B)(i), 841(b)(1)(B)(vi), and 841(b)(1)(C)	Possession with intent to distribute 100 grams or more a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance and a detectable amount of fentanyl, a Schedule II controlled substance, and a quantity of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance	<input checked="" type="checkbox"/>	

#### FORFEITURE ALLEGATIONS

I certify that to the best of my knowledge the above entries are true and correct.

MAY 04 2021

DATE: \_\_\_\_\_

/s/ Katherine C. Jordan  
KATHERINE C. JORDAN  
Assistant U.S. Attorney  
PA ID No. 201135

IN THE UNITED STATES DISTRICT COURT  
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UNITED STATES OF AMERICA

v.

CASSANDRA HOLDSWORTH

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[UNDER SEAL]

**FILED**

MAY 04 2021

**INDICTMENT MEMORANDUM**

CLERK U.S. DISTRICT COURT  
WEST. DIST. OF PENNSYLVANIA

AND NOW comes the United States of America, by its attorneys, Stephen R. Kaufman, Acting United States Attorney for the Western District of Pennsylvania, and Katherine C. Jordan, Assistant United States Attorney for said District, and submits this Indictment Memorandum to the Court:

**I. THE INDICTMENT**

A federal grand jury returned a two-count Indictment against the above-named defendant for alleged violations of federal law:

<u>COUNT</u>	<u>OFFENSE/DATE</u>	<u>TITLE/SECTION</u>
1	Conspiracy to possess with intent to distribute 100 grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and a detectable amount of fentanyl, a Schedule II controlled substance; and a quantity of a mixture and substance containing a detectable amount of cocaine, a Schedule II	21 U.S.C. § 846

controlled substance

From on or about December 22, 2020 and continuing to on or about December 23, 2020

2 Possession with intent to distribute 100 grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and a detectable amount of fentanyl, a Schedule II controlled substance; and a quantity of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance

21 U.S.C. §§ 841(a)(1), 841(b)(1)(B)(i), 841(b)(1)(B)(vi), and 841(b)(1)(C)

On or about December 23, 2020

## **II. ELEMENTS OF THE OFFENSES**

### **A. As to Count 1:**

In order for the crime of conspiracy to possess with intent to distribute and distribute 100 grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and a detectable amount of fentanyl, a Schedule II controlled substance; and a quantity of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of 21 U.S.C. § 846, to be established, the government must prove all of the following essential elements beyond a reasonable doubt:

1. That two or more persons agreed to possess with the intent to distribute and distribute a controlled substance.

2. That the defendant was a party to or member of that agreement.

3. That the defendant joined the agreement or conspiracy knowing of its objective to possess with the intent to distribute and distribute a controlled substance and intending to join together with at least one other alleged conspirator to achieve that objective; that is, that the defendant and at least one other alleged conspirator shared a unity of purpose and the intent to achieve that objective.

4. That heroin is a Schedule I controlled substance, pursuant to 21 U.S.C. § 812(c), Schedule I(b)(10), that fentanyl is a Schedule II controlled substance, pursuant to 21 U.S.C. § 812(c), Schedule II (b)(6); and that cocaine is a Schedule II controlled substance, pursuant to 21 U.S.C. § 812(c), Schedule II (a)(4).

5. That the amount of heroin attributable to the defendant as a result of her own conduct and the conduct of conspirators reasonably foreseeable to her was 100 grams or more and/or that the amount of fentanyl was 40 grams or more. 21 U.S.C. §§ 841(b)(1)(B)(i), 841(b)(1)(B)(vi).

Apprendi v. New Jersey, 530 U.S. 466 (2000).

Third Circuit Model Criminal Jury Instruction 6.21.846B (modified).

**B. As to Count 2:**

In order for the crime of possession with intent to distribute 100 grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance and a detectable amount of fentanyl, a Schedule II controlled substance; and a quantity of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of 21 U.S.C. §§ 841(a)(1), 841(b)(1)(B)(i), 841(b)(1)(B)(vi) and

841(b)(1)(C), to be established, the government must prove all of the following essential elements beyond a reasonable doubt:

1. That on or about the date set forth, the defendant possessed with intent to distribute the controlled substance(s) charged in the Indictment.

United States v. Lartey, 716 F.2d 955, 967 (2d Cir. 1983); United States v. Wright, 593 F.2d 105, 107-108 (9th Cir. 1979); United States v. Tighe, 551 F.2d 18, 21 (3d Cir.), cert. denied, 434 U.S. 823 (1977).

2. That the defendant did so knowingly and intentionally.

United States v. Jewell, 532 F.2d 697, 699-700 (9<sup>th</sup> Cir.), cert. denied, 426 U.S. 951 (1976); United States v. Kairouz, 751 F.2d 467, 469 (1st Cir. 1985).

3. That heroin is a Schedule I controlled substance, pursuant to 21 U.S.C. § 812(c), Schedule I(b)(10), that fentanyl is a Schedule II controlled substance, pursuant to 21 U.S.C. § 812(c), Schedule I (b)(6) and that cocaine is a Schedule II controlled substance, pursuant to 21 U.S.C. § 812(c), Schedule II (a)(4).

4. That the mixture or substance containing a detectable amount of heroin was 100 grams or more, and/or that the mixture or substance containing a detectable amount of fentanyl was 40 grams or more. 21 U.S.C. §§ 841(b)(1)(B)(i), 841(b)(1)(B)(vi).

Apprendi v. New Jersey, 530 U.S. 466 (2000).

### **III. PENALTIES**

**A. As to Counts One and Two: Conspiracy to possess with intent to distribute and distribute 100 grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and a detectable amount of**

fentanyl, a Schedule II controlled substance and a quantity of a mixture and substance containing a detectable amount of cocaine (21 U.S.C. § 846)/Possession with intent to distribute 100 grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and a detectable amount of fentanyl, a Schedule II controlled substance; and a quantity of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance (21 U.S.C. §§ 841(a)(1), 841(b)(1)(B)(i), 841(b)(1)(B)(vi), and 841(b)(1)(C));

1. A term of imprisonment of not less than five (5) years to a maximum of forty (40) years.
2. A fine not to exceed \$5,000,000.
3. A term of supervised release of at least four (4) years.

If the defendant has a prior conviction for a serious drug felony or a serious violent felony that is final:

1. A term of imprisonment of not less than ten (10) years to a maximum of life.
2. A fine not to exceed \$8,000,000.
3. A term of supervised release of at least eight (8) years.

#### **IV. MANDATORY SPECIAL ASSESSMENT**

A mandatory special assessment of \$100.00 must be imposed at each count upon which the defendant is convicted, pursuant to 18 U.S.C. § 3013.

#### **V. RESTITUTION**

Not applicable in this case.

**VI. FORFEITURE**

As set forth in the Indictment, forfeiture may be applicable in this case.

Respectfully submitted,

STEPHEN R. KAUFMAN  
Acting United States Attorney

*/s/ Katherine C. Jordan*  
KATHERINE C. JORDAN  
Assistant U.S. Attorney  
PA ID No. 201135

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

CASSANDRA HOLDSWORTH

WARRANT FOR ARREST

[FID#: 11273695]

Case Number: 2:21-CR-00196-AJS  
\*SEALED\*

To: The United States Marshal  
and any Authorized United States Officer

YOU ARE HEREBY COMMANDED to arrest

CASSANDRA HOLDSWORTH,

and bring him or her forthwith to the nearest magistrate judge to answer a(n)

Indictment  Superseding Indictment  Information  Superseding Information  Complaint  
 Order of Court  Violation Notice  Probation  Violation Petition  Supervised Release Violation Petition

charging him or her with (brief description of offense)

Conspiracy to possess with intent to distribute and distribute 100 grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and a detectable amount of fentanyl, a Schedule II controlled substance, and a quantity of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance; Possession with intent to distribute 100 grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance and a detectable amount of fentanyl, a Schedule II controlled substance, and a quantity of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance

in violation of United States Title:Section(s)

Count 1: 21 U.S.C. 846, Count 2: 21 U.S.C. 841(a)(1), 841(b)(1)(B)(i), 841(b)(1)(B)(vi), and 841(b)(1)(C)

Lynn Ann Reppar  
Name of Issuing Officer

Lynn Ann Reppar  
Signature of Issuing Officer



Deputy Clerk

Title of Issuing Officer

05/05/2021 Pittsburgh

Date and Location

Bond to be set by U.S. Magistrate Judge.